



NIAGARA FALLS NATURE CLUB

P.O. BOX 901, NIAGARA FALLS, ONTARIO, L2E 6V8.

November 21, 2022

Doug Ford, Premier of Ontario

Steve Clark, Minister of Municipal Affairs and Housing

David Piccini, Minister of Environment, Conservation and Parks

RE: Bill 23 – More Housing Built Faster Act

Dear Premier Ford and Ministers Clark and Piccini,

The Niagara Falls Nature Club, with more than one hundred members, has advocated for the protection of Niagara's wetlands and other natural areas for over fifty years. We focus on educating the public on natural history topics through monthly meetings with speakers and with a variety of walks at natural places throughout the Niagara area. We enhance our well-being by enjoying nature together.

Many parts of Bill 23 are extremely concerning to our membership such as:

Public participation – Land planning affects everyone in a given community. Governmental planning decisions need to be open and transparent. Citizens should have a right to participate in planning decisions and have a right to appeal. Natural areas and farmland are important to all residents of a municipality and we all have an obligation to preserve them for future generations. We are not against development, but it should not be at the expense of the environment.

Conservation Authorities – these agencies employ scientists and technicians with knowledge and experience to regulate development to ensure that it does not lead to an increase in flooding, erosion, pollution and other hazards. The permitting functions they now employ are vital in protecting both human settlements and wildlife habitat. The Watershed approach to planning enables the Conservation Authorities to co-ordinate these functions across the landscape. The Conservation Authorities, under this legislation, would not even be permitted to comment on future developments despite their expertise and experience in planning.

As members of a nature club, Conservation Authority lands are extremely important to us. We frequently visit these areas and we would be horrified if any were sold to developers. These natural areas are vital for the majority of people in Niagara, many of whom do not have the means to access nature far from home. Conservation Authority lands belong to the people of

Ontario, not to developers to provide more sprawl for wealthy homebuyers.

Regional planning – Our nature club recently joined other environmentally focused groups in sharing with our regional councillors what we would like to see in the regional environmental plan. We came together to develop a framework to allow development while also protecting natural areas and farmland. Removing their powers to plan and leaving it to municipalities would lead to growth that is much more damaging to the environment.

Wetlands and Natural Heritage – Re-evaluating wetlands in the matter described in this proposed legislation would lead to the loss of protection for more of them. The Ontario Wetland Evaluation System should be strengthened, not discarded. Here in Niagara, most of our wetlands are complexes. These new rules would mean that most of our wetlands would no longer have any protection at all. Wetlands are vital for flood and pollution control. Many species depend on wetlands to survive and they are a very important aspect of wildlife habitat.

Provincial Policy Statement – This document lays out how development can be permitted while giving some protection to farmlands and natural areas. These protections are needed. A Province consisting of sprawling subdivisions with few functioning natural heritage areas would be a bleak place to live.

Offsetting – The government should not introduce a policy allowing offsetting as there is so little evidence that it can succeed. Permitting developers to destroy wetlands and pay into an offsetting fund would mean the destruction of many wetlands and other natural areas with no benefit to anyone but the developers. The vast majority of the residents of Ontario would be left with only the loss of much of our natural heritage.

This bill does little to provide more housing. Some protections for renters would be removed and many renters have already seen rents increased and vacancies are few. More sprawling subdivisions will not help those most in need of housing. We already have enough land for the projected population increase and there are many areas that can be re-developed and densified.

Ontario is a province in a democratic country. All citizens should have the right to be part of planning decisions.

Please protect Ontario's biodiversity and beauty and withdraw this bill.

Sincerely,
Joyce Sankey
Conservation Director, Niagara Falls Nature Club

C: Wayne Gates, MPP, Sam Oosterhoff, MPP, Jeff Burch, MPP, Jennie Stevens, MPP, Sandy Shaw, MPP